

EEI – 4/13 at 10am

- Ensure existing fleet transition plans are a part of the rule
- 3 key considerations
 - Align timing of compliance obligations to the extent possible
 - Tailored compliance flexibilities: subcategories to opt into for retirement (coal and gas)
 - Regulations recognize the role turbines play in near term to maintain reliability and allow for intermittent resources
- Gas will continue to play an important role in pushing remaining coal off the system
 - Hydrogen and CCS, significant questions about their cost/performance
 - Don't find them "adequately demonstrated"
 - Allow for hydrogen capable and CCS capable options—regional variability
 - Offer mass based compliance alternative for new units
- Existing source flexibilities
 - Allow for units to choose among multiple potential pathways
 - Tailored subcategories, especially those that units can opt into for retirements, low capacity
 - Allow mass-based compliance options: translate rate to mass would provide significant operational flexibility
 - Broad and varied averaging provisions: 12 month rolling averages, multi-year averaging, fleetwide averaging, statewide averaging
 - Consider approval pathways for trading plans (RGGI, CA)
- Existing gas
 - Support fleet transition
 - Work in concert with new gas and existing coal
 - No negative consequences that could prolong coal
 - Size, age, capacity factor